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UNIVERSITY OF CALIFORNIA
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9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11

12 EDWARD “COACH” WEINHAUS,
13 Plaintiff,

14 v.

15 REGENTS OF THE UNIVERSITY OF
CALIFORNIA,
16 Defendant.
17

Case No. 2:25-cv-00262 JFW (ASx)

**DECLARATION OF MATTHEW
W. BURRIS IN SUPPORT OF
DEFENDANT THE REGENTS OF
THE UNIVERSITY OF
CALIFORNIA’S EX PARTE
APPLICATION TO EXTEND
DEADLINES**

Judge: John F. Walter
Mag. Judge: Alka Sagar
Crtrm.: 7A
Trial Date: Not Set
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21 I, Matthew W. Burris, declare as follows:

22 1. I am an associate in Quarles & Brady LLP, attorneys of record for THE
23 REGENTS OF THE UNIVERSITY OF CALIFORNIA (“Defendant”) in the above-
24 entitled matter, and am licensed to practice before this Court. I have personal
25 knowledge of the following facts and, if called as a witness, could and would testify
26 competently thereto.

27 2. On March 6, 2025, I met and conferred with Mr. Weinhaus and his co-
28 counsel, Mr. Adam Florek, regarding Defendant’s motion to dismiss. In advance of

1 our conference, I provided a written outline of the arguments Defendant anticipated
2 making via this motion to dismiss, as well as the authorities relied on. This
3 conference lasted approximately 20 minutes. During our call, we exchanged our
4 respective views on those arguments, but ultimately were not able to reach
5 agreement though our meet and confer efforts.

6 3. My office filed Defendant's Motion to Dismiss on March 17, 2025. On
7 March 18, 2025, the Court struck Defendant's Motion for failure to timely file a
8 Joint Statement of a Local Rule 7-3 Conference, and ordered the parties to meet and
9 confer a second time.

10 4. On March 19, 2025, I emailed Mrs. Weinhaus and Florek regarding the
11 additional Rule 7-3 Conference the Court ordered on March 18, 2025. Mr.
12 Weinhaus indicated he was not available until the week of April 1, 2025 due to
13 leaving on a personal vacation, but represented via email that he would not be
14 "enforcing the issue of default for the time on holiday but without waiving any
15 issues or rights."

16 5. The parties agreed to conduct the additional Rule 7-3 Conference on
17 April 1, 2025, at 9:00 a.m., after Mr. Weinhaus returned from holiday.

18 6. In light of this delay, I requested that Mr. Weinhaus submit a joint
19 motion reflecting the requested extension, and an extension of the parties' deadline
20 to conduct a Rule 26(f) conference. I sent a proposed motion to Mrs. Weinhaus and
21 Florek on March 21, 2025. A true and correct copy of this proposed motion is
22 attached hereto as **Exhibit 1**.

23 7. Mr. Weinhaus did not agree to join in the proposed motion. He
24 additionally stated via email: "My good faith word should suffice for the redress
25 you need without sacrificing any of my rights."

26 8. I informed Mrs. Weinhaus and Florek via email of Defendant's intent
27 to file the instant *ex parte* application on March 23 and 25, 2025. Mr. Weinhaus
28 indicated he would oppose the application.

1 I declare under penalty of perjury under the laws of the State of California
2 that the foregoing is true and correct.

3 Executed on this 26th day of March, 2025, at San Diego, California.

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5 /s/ Matthew W. Burris
6 Matthew W. Burris
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